

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

Defendants.
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Dear Honorable Judge Chen,

Your undersign and affirmant is a former litigant, specifically a former third-party Defendant and counter claimant in the above referenced matter.

Your Honor on September 25, 2024, had previously awarded your affirmant with attorney fees and costs, in connection with Defendant's, Safa Abdulrahman Gelardi's ("Safa") contemptible behavior. Specifically, a sum of \$8,099.11, which has to date been unpaid.

On April 2, 2025, the Court ordered Defendants to file both personal and business financial records. See Text Only Order dated April 2, 2025.

On May 30, 2025, the Court ordered a 30-day extension to the stay on this matter See ECF Docket Entry 500, as a result of Defendant's request. In addition, the Court stated, "For this reason, the Court is not going to direct Individual Defendants to fully comply with the Court's previous orders while the stay is still in effect..." The stay is no longer in effect as of June 30, 2025.

Your affirmant respectfully request this Court order Defendants to comply with the reasonable April 2, 2025, order. Delaying such a request will only prejudice parties who are owed monies in this litigation, specifically your affirmant, Plaintiff, and BRG the neutral forensic examiner.

*** Filed ***
10:43 AM, 03 Jul, 2025
U.S.D.C., Eastern District of New York
Rec'd 7/1/25

Case No.: 1:22-cv-1032 (PKC) (JRC)

**MOTION TO STRIKE DEFENDANT'S
FILINGS PURSUANT TO RULE 11**

Additionally, pursuant to Rule 11, Every pleading, written motion, and other paper must be signed by at least one attorney of record in the attorney's name—or by a party personally if the party is unrepresented. The paper must state the signer's address, e-mail address, and telephone number. Unless a rule or statute specifically states otherwise, a pleading need not be verified or accompanied by an affidavit. The court must strike an unsigned paper unless the omission is promptly corrected after being called to the attorney's or party's attention; as a result, all of Defendant's filings as to Vito should be struck specifically the following entries:

- See Docket Entry 499 begins with, “Defendants, appearing pro se,...” and ends with only Safa’s signature, and no signature as to Vito.
- See Docket Entry 514 begins with, “DEFENDANTS' EMERGENCY RESPONSE IN OPPOSITION TO PLAINTIFF'S MOTION TO STRIKE...” and ends with only Safa’s signature, and no signature as to Vito.
- See Docket Entry 516 begins with, “Defendants Safa Gelardi and Vito Gelardi, appearing pro se...” and ends with only Safa’s signature, and no signature as to Vito.
- See Docket Entry 518 begins with, “The Defendants respectfully submit...” and ends with only Safa’s signature, and no signature as to Vito.
- See Docket Entry 526 begins with, “Defendants Safa Gelardi and Vito Gelardi, appearing pro se,...” and ends with only Safa’s signature, and no signature as to Vito.

The Court should strike any and all docket entries as to Vito, as he did not properly sign any of the pleadings, see *in re Fosamax Products Liability Litig.*, No. 09-CV-7255, 2010 WL 1685726, at *2 (S.D.N.Y. April 26, 2010) (dismissing pleading where not signed by authorized attorney); *DiProgetto v. Allen*, No. 08-CV-6430, 2009 WL 1405447, at *2 (W.D.N.Y. May 18, 2009), the Court correctly struck all documents not signed by Counsel. In the instant matter, Defendants Safa and Vito are self-represented litigants.

In fact, since Vito did not sign Defendant's motion to lift the prejudgment attachment, it is only proper and just, pursuant to Rule 11, that his portion of 5265 Milford Rd East Stroudsburg, PA 18302 remain attached in *toto*.

Accordingly, your affirmant respectfully request this Court order Defendants Vito and Safa to produce all personal and business financials as ordered on April 2, 2025, since the stay in the present matter is lifted, and strike all of pleadings as to Vito.

Your affirmant respectfully submits this motion to the Court, in an attempt to recover the already awarded attorney fees and costs.

Dated: New York, New York
July 1, 2025,

Respectfully Submitted,

_____/s/_____

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